

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

EMANUEL PRELDAKAJ, on behalf of himself and all others similarly situated,

Index No.: 20-cv-09433(VSB)

Plaintiff,

v.

THE MONARCH CONDOMINIUM, THE MONARCH CONDOMINUM BOARD OF MANAGERS and LASALA MANAGEMENT, INC.

Defendants.

NOTICE OF JOINT MOTION FOR (1) FINAL APPROVAL OF SETTLEMENT;
(2) CERTIFICATION OF THE SETTLEMENT CLASS;
AND (3) ENTRY OF JUDGMENT

PLEASE TAKE NOTICE that upon the Parties' Joint Memorandum of Law in Support of Final Approval of Settlement dated March 9, 2022, the Declaration of Brett R. Gallaway dated March 9, 2022, together with the exhibits annexed thereto; Plaintiff and Defendants, by and through their respective counsel, shall jointly move this Court, Honorable Vernon S. Broderick, United States District Judge, on March 24, 2022 at 4:00 p.m., for an Order as follows: (i) granting final approval of the Settlement on the terms set forth in the Joint Stipulation of Settlement and Release (the "Settlement Agreement") (Dkt. No. 33-1); (ii) certifying the settlement class for settlement purposes only, under Federal Rule of Civil Procedure 23(b)(3); (iii) confirming that the requirements of the Class Action Fairness Act of 2005, 28 U.S.C. § 1711 *et seq.*, have been satisfied; and (iv) entering judgment in accordance with the Settlement Agreement.

[Remainder of page left intentionally blank]

Dated: New York, New York
March 9, 2022

McLAUGHLIN & STERN, LLP

By: 

Brett R. Gallaway

Lee S. Shalov

Jason S. Giaimo

260 Madison Avenue

New York, New York 10016

Tel.: (212) 448-1100

Attorneys for Plaintiffs